

February 14, 2017

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street N.W.
Washington, DC 20554

Re: Planet Labs Inc., Call Sign S2912, IBFS File No. SAT-MOD-20150802-00053

Dear Ms. Dortch:

Planet Labs Inc. ("Planet") hereby submits this letter and attachment to correct errors in the ownership exhibit submitted with the above-referenced application on August 2, 2015. Specifically, William S. Marshall, Robert H. Schingler Jr., and Christopher R. Boshuizen, who are identified as officers and directors of Planet, were inadvertently omitted from the list of shareholders in the ownership exhibit, even though each had voting interests in Planet exceeding ten percent, as of the date of the August 2, 2015 filing.¹ Also, in the ownership exhibit Draper Fisher Jurvetson should have been identified as having an approximately 16.3% equity interest (on a fully diluted basis) rather than an 18.13% voting interest. Attached is a corrected ownership exhibit.

Please contact the undersigned if you have any questions.

Sincerely,

/s/ Tony Lin
Tony Lin

Counsel
Tony.Lin@hoganlovells.com
D 202-637-5795

Enclosure

cc: Stephen Duall

¹ The three individuals, who are co-founders of the company, were disclosed in the initial 2013 satellite application as shareholders having a greater than ten percent interest in the company. See Application of Planet Labs Inc., IBFS File No. SAT-LOA-20130626-00087 (filed June 26, 2013).

ATTACHMENT

EXHIBIT 40

Planet Labs Inc.
License Application
FCC Form 312
July 2015 (as corrected)

INFORMATION CONCERNING SHAREHOLDERS, OFFICERS AND DIRECTORS

Planet Labs Inc. (“Planet Labs”), formerly known as Cosmogia Inc. (“Cosmogia”), is a privately held corporation. The following individuals or corporations hold a 10 percent or more equity and/or voting interest in Planet Labs:

<u>Name</u>	Draper Fisher Jurvetson
<u>Address</u>	2882 Sand Hill Road, Suite 150 Menlo Park, CA 94025
<u>Citizenship or State of Incorporation</u>	California
<u>Percentage of Equity Interest (fully diluted)</u>	~ 16.3%

<u>Name</u>	William S. Marshall
<u>Address</u>	346 9 th St. San Francisco, CA 94103
<u>Citizenship or State of Incorporation</u>	United Kingdom
<u>Percentage of Voting Interest</u>	~ 27.33%

<u>Name</u>	Robert H. Schingler, Jr.
<u>Address</u>	346 9 th St. San Francisco, CA 94103
<u>Citizenship or State of Incorporation</u>	United States
<u>Percentage of Voting Interest</u>	~ 27.33%

<u>Name</u>	Christopher R. Boshuizen
<u>Address</u>	346 9 th St. San Francisco, CA 94103
<u>Citizenship or State of Incorporation</u>	United States
<u>Percentage of Voting Interest</u>	~ 27.33%

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The officers of Planet Labs are:

Name Robert H. Schingler, Jr.
Address 346 9th St.
San Francisco, CA 94103

Name Christopher R. Boshuizen
Address 346 9th St.
San Francisco, CA 94103

Name William S. Marshall
Address 346 9th St.
San Francisco, CA 94103

Name Tom Barton
Address 346 9th St.
San Francisco, CA 94103

The directors of Planet Labs are:

Robert H. Schingler, Jr.
Christopher R. Boshuizen
William S. Marshall

Steve Jurvetson 2882 Sand Hill Road, Suite 150
Menlo Park, CA 94025

Zachary Bogue 665 3rd Street, Suite 150,
San Francisco, CA 94107